

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

and

CHILDREN'S MEDICAL CENTER
CORPORATION,

Plaintiffs,

v.

SHIRE PHARMACEUTICALS, INC.,

and

SHIRE REGENERATIVE
MEDICINE, INC.,

Defendants

Civil Action No. 13-cv-10020

**PLAINTIFFS MASSACHUSETTS INSTITUTE OF TECHNOLOGY
AND CHILDREN'S MEDICAL CENTER CORPORATION'S
UNOPPOSED MOTION TO FILE UNDER SEAL THEIR
SUPPLEMENTAL INFRINGEMENT CONTENTIONS**

Pursuant to Local Rule 7.2 and Paragraph 17 of the Joint Protective Order, dated February 15, 2014 [D.I. 60], Plaintiffs Massachusetts Institute of Technology and Children's Medical Center Corporation (collectively, "Plaintiffs") move this Court for an Order allowing the filing of Plaintiffs' Supplemental Infringement Contentions regarding United States Patent Nos. 5,770,193 and 5,759,830, ("Supplemental Contentions") under seal.

Plaintiffs' Supplemental Contentions contain information designated by Defendants Shire Pharmaceuticals LLC (f/k/a Shire Pharmaceuticals, Inc.) and Shire Regenerative Medicine, Inc. as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL" pursuant to the Joint Protective Order.

Therefore, Plaintiffs ask that their Supplemental Contentions be impounded until sixty days following the entry of final judgment, and then returned to counsel for Plaintiffs.

Plaintiffs have conferred with counsel for Defendants and Defendants do not oppose Plaintiffs' motion. Pursuant to Paragraph 17 of the Joint Protective Order and Local Rule 7.2, Defendants will file a redacted version of Plaintiffs' Supplemental Contentions and will serve by e-mail a copy of the sealed filings in advance of a ruling on this Motion.

WHEREFORE, Defendants respectfully request that the Court allow this motion and permit Plaintiffs to file their Supplemental Contentions under seal.

Dated: November 18, 2014

Respectfully submitted,

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY and CHILDREN'S
MEDICAL CENTER CORPORATION

By their attorneys,

/s/ Daryl L. Wiesen
Daryl L. Wiesen (BBO No.634872)
dwiesen@goodwinprocter.com
Daniel M. Forman (BBO No. 637405)
dforman@goodwinprocter.com
Nicholas K. Mitrokostas (BBO No. 657974)
nmitrokostas@goodwinprocter.com
GOODWIN PROCTER LLP
Exchange Place
Boston, Massachusetts 02109-2881
Tel: (617) 570-1000
Fax: (617) 523-1231

LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Daryl L. Wiesen, hereby certify that counsel for the parties conferred on November 18, 2014 in an effort to resolve or narrow the issues presented in this motion prior to filing, and that Defendants do not oppose the relief requested in this Motion.

/s/ Daryl L. Wiesen

CERTIFICATE OF SERVICE

I, Daryl L. Wiesen, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 18, 2014.

/s/ Daryl L. Wiesen